

IN THE DISTRICT COURT OF CHOCTAW COUNTY
STATE OF OKLAHOMA

FILED
IN DISTRICT COURT
CHOCTAW COUNTY, OKLAHOMA

MIKE MCCLURE,

Plaintiff,

vs.

JAI SHRI GANESH, LLC D/B/A HOLIDAY
MOTEL,

Defendant.

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Case No. CJ-2021-23

AUG 09 2021

Laura Sumner, Court Clerk

By _____ Deputy

PETITION

COMES NOW Plaintiff, Mike McClure and for his causes of action against the above-named Defendant, Jai Shri Ganesh, LLC d/b/a Holiday Motel, alleges and states as follows:

1. That on or about September 19, 2019, Plaintiff was a guest at the Holiday Motel in Hugo, Choctaw County, Oklahoma.
2. That while on Defendant's premises, Defendant allowed an unsafe condition to exist, causing Plaintiff to be injured.
3. That the Defendant was negligent in failing to maintain their property in a safe condition for its guests.
4. That the Defendant was negligent in failing to warn Plaintiff of the dangerous condition on its premises.
5. That Defendant created the dangerous condition that caused Plaintiff to be injured.
6. That as a direct result of the Defendant's negligence, the Plaintiff suffered injuries, was prevented from transacting his business, suffered great pain of body and mind, and incurred expenses for medical attention for said injuries.

WHEREFORE, premises considered, Plaintiff prays for judgment against Defendant in an

EXHIBIT

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amount in excess of the amount required for diversity jurisdiction pursuant to Section 1332 of Title 28 of the United States Code, in addition to judgment interest, costs, attorney fees, and all other relief available to Plaintiffs or otherwise deemed just and equitable by this Court.

Respectfully submitted,

MARTIN JEAN & JACKSON

By:



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